

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

DS ADVANCED ENTERPRISES,
LTD.,
Plaintiff,
v.
COOPER LIGHTING, LLC,
Defendant.

Civil Case No.: 1:24-cv-05643-TRJ

**DECLARATION OF PATRICK CUMMINS IN SUPPORT OF
PLAINTIFF DS ADVANCED ENTERPRISES, LTD.'S REPLY TO
DEFENDANT, COOPER LIGHTING, LLC'S OPPOSITION TO
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGEMENT
MOTION OF PATENT INFRINGEMENT**

I, Patrick Cummins, declare as follows:

1. I am over the age of eighteen and not a party to this action. I am an attorney licensed to practice law before all Courts of the State of California and am admitted to practice before the Central District of California. I am counsel at Cummins IP PLLC.

2. I am the attorney of record for the Plaintiff in this matter. I have personal knowledge of the facts stated in this Declaration and, if called to testify, could and would testify competently and under oath to these facts.

3. I captured the images of the Accused Products found in the Complaint (Doc. No. 1) in Tables 1-10, pgs. 24-46. I test purchased the Accused Products in preparation of the Complaint.

4. Exhibit A is a true and correct copy of images of the Accused Products. I personally annotated the images in Exhibit A for explanatory purposes.

5. Exhibit B, as filed under seal, is a true and correct copies of portions of COOP-DSAE-0001796 and 1483 produced by Defendant, Cooper Lighting, LLC. I personally annotated the image to include the green shapes to emphasize the language Cooper utilized to refer to the parts of the product shown.

6. Exhibit C, as filed under seal, is a true and correct copy of a portion of COOP-DSAE-0001478 produced by Defendant, Cooper Lighting, LLC. I annotated the image to include green shapes to emphasize certain content of the image.

7. Exhibit D, as filed under seal, is a true and correct copy of a portion of COOP-DSAE-0001514 produced by Defendant, Cooper Lighting, LLC. I annotated the image to include a green shape to emphasize certain content of the image.

8. Exhibit E, as filed under seal, is a true and correct copy of a portion of COOP-DSAE-0001732 produced by Defendant, Cooper Lighting, LLC. I annotated the image to include green shapes to emphasize certain content of the image.

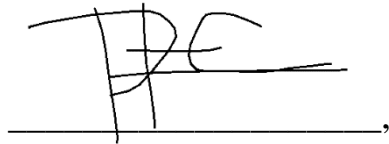
9. Exhibit F, as filed under seal, is a true and correct copy of a portion of COOP-DSAE-0001353 produced by Defendant, Cooper Lighting, LLC. I annotated the image to include green shapes to emphasize certain content of the image.

10. Exhibit G includes a copy of an image I captured of instructions included with a Home Depot product accused of infringing the '118 Patent. Exhibit G also includes snippets from a PDF of the instructions that can be downloaded from Home Depot at the website provided in Exhibit G. I

personally annotated the images in Exhibit G to emphasize certain content of the image.

In accordance with 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 10th day of March, 2025, in Lexington, Kentucky.

A handwritten signature in black ink, appearing to be 'PD Cummins', written over a horizontal line.

Patrick D. Cummins, CA Bar No. 294400

Attorney for DS Advanced Enterprises, Ltd.